



SemaConnect Inc
4961 Tesla Drive, Bowie, MD 20715
T (301) 352 3730 F (301) 352 4232

May 21, 2018

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: SemaConnect Comments on the State of California Proposed VW Beneficiary Mitigation Plan

Dear Chairman Nichols:

SemaConnect commends the California Air Resources Board (CARB) for its dedicated and consistent leadership in advancing vehicle electrification. We respectfully submit the following recommendation in response to CARB's request for comments on the proposed Volkswagen (VW) Settlement Beneficiary Mitigation Plan (BMP).

Recommendation

- **Utilize the maximum 15% allowable to fund light duty electric vehicle (EV) charging infrastructure**

In 2016, transportation [dethroned](#) electricity generation to claim the dubious distinction as the highest polluting sector in our economy. In fact, transportation was the only consumption sector where carbon emissions increased. It now accounts for more than one-fourth of all U.S. greenhouse gas (GHG) emissions.

Electrification of transportation is essential in order to decarbonize our transportation sector and achieve cleaner, healthier air because EVs emit far less pollution than gas-powered vehicles. A recent Union of Concerned Scientists (UCS) report [confirmed](#) that even after taking into account EVs' more electricity-intensive manufacturing process, battery electric vehicles (BEVs) produce less than half the GHG emissions as comparable gas-fueled cars over their full life cycle.

Charging infrastructure is the *sine qua non*—the essential ingredient—necessary to move EV adoption beyond the early adopters and into the mainstream. Drivers of gas vehicles take for granted their ability to fuel up wherever they go, because gas stations have spread like wildfire since the first “filling station” opened in Pittsburgh in 1905. On the other hand, publicly accessible EV charging infrastructure is not readily available outside of a handful of markets. This “relative lack of charging infrastructure” holds back widespread adoption

of EVs, [according to](#) the Financial Times. Indeed, the International Energy Administration (IEA) [reports](#):

“Charging infrastructure, whether at home, at work or at public locations, is indispensable for operating EVs... the availability of chargers [is] one of the key factors for contributing to the market penetration of EVs.” (emphasis added)

SemaConnect recognizes that California’s BMP is not the only opportunity to achieve significant deployments of charging infrastructure; the draft document cites this factor in recommending allocating only 2% of funds on charging infrastructure. Still, SemaConnect believes that even the significant procurements beyond the planned deployments by the State of California, Electrify America, electric utilities and other entities are needed if to meaningfully improve air quality for every Californian. Indeed, the draft BMP acknowledges that these collective deployments “fall short of Energy Commission staff’s estimate that between 125,000 and 174,000 additional chargers will be needed to meet California’s earlier light-duty vehicle electrification goals of 1.5 million ZEVs by 2025” (page 33) and “that additional funding will be needed as part of a broader long-term effort to fully meet growing demand” (page 35).

For these reasons, SemaConnect respectfully recommends that CARB increase the funding for light-duty EV infrastructure from the proposed level of 2% to the maximum allowable allocation of 15 percent.

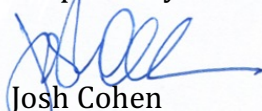
About SemaConnect

SemaConnect is the leading provider of electric vehicle (EV) amenities to the North American commercial and residential property market. We are a proven partner to premier properties across the nation and have built trusted relationships with some of the most well-known commercial brands in the building space such as CBRE, JLL, Hines, Greystar, Cisco Systems and Standard Parking. With gorgeously-designed stations, smart engineering and software controls to maximize uptime, and a truly open user network with robust tools for measuring and collecting valuable data, property owners, managers and clientele can realize unsurpassed value with SemaConnect’s EV solutions.

SemaConnect is American-owned and we design, assemble and distribute all of our products at our headquarters in Maryland.

Thank you for this opportunity to offer input, and for your consideration in this important matter. If SemaConnect can provide additional information about its products or otherwise be helpful, please do not hesitate to contact me directly at josh.cohen@semaconnect.com.

Respectfully submitted,



Josh Cohen
Head – Public Programs